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*Attorneys for Defendants Benjamin F. Daniels,  
Mark W. Schuler, Alton O. Parker, B & B  
Investment Group, LLC, and BW Holdings,  
LLC d/b/a the “FAIR Project”*

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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, NORTHERN DIVISION**

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SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING, INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah

**DEFENDANTS BENJAMIN F.  
DANIELS, MARK W. SCHULER,  
ALTON O. PARKER, B&B  
INVESTMENT GROUP, LLC, AND BW  
HOLDINGS LLC’S JOINDER IN  
DEFENDANTS IX GLOBAL, LLC,  
JOSEPH A. MARTINEZ, AND TRAVIS  
FLAHERTY’S REPLY IN SUPPORT OF  
RULE 12(b)(6) MOTION TO DISMISS**

Case No. 2:23-cv-00482-RJS

Chief Judge Robert J. Shelby

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limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual,

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDING, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

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Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and DUCivR 7-1(a)(7),

Defendants Benjamin F. Daniels, Mark W. Schuler, Alton O. Parker, B&B Investment Group,

LLC, and BW Holdings, LLC (collectively, the **“FAIR Project Defendants”**) hereby join in

Defendants IX Global, LLC, Joseph A. Martinez, and Travis Flaherty’s (the **“iX Global**

**Defendants”**) Reply in Support of Rule 12(b)(6) Motion to Dismiss<sup>1</sup> and respectfully request

that the Court dismiss the Complaint filed by Plaintiff Securities and Exchange Commission for

failure to state a claim upon which relief can be granted for the reasons stated therein.

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<sup>1</sup> See Doc. [219].

DATED this 4th day of December 2023.

CLYDE SNOW & SESSIONS

/s/ Keith M. Woodwell

Keith M. Woodwell

Thomas A. Brady

Katherine E. Pepin

*Attorneys for Defendants Benjamin F. Daniels,  
Mark W. Schuler, Alton O. Parker, B & B  
Investment Group, LLC, and BW Holdings, LLC  
d/b/a the “FAIR Project”*

**CERTIFICATE OF SERVICE**

I certify that on the 4th day of December 2023, I caused a true and correct copy of the foregoing document to be sent to all attorneys of record via the court's e-filing system.

CLYDE SNOW & SESSIONS

/s/ *Kelcie Kinsley*